

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

**DAVIS POLK & WARDWELL LLP, Thomas Reid,
John Bick, William Chudd, Sophia Hudson, Harold
Birnbaum, Daniel Brass, Brian Wolfe, and John H.
Butler,**

Defendants.

1:19-cv-10256-GHW

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE
TO FILE A THIRD AMENDED COMPLAINT**

Please take notice that, upon this notice of motion, the accompanying memorandum of law, and the declaration of David Jeffries dated March 17, 2021 and exhibits thereto, plaintiff Kaloma Cardwell will move before the Honorable Gregory H. Woods, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Rule 16(b) and Rule 15(a) of the Federal Rules of Civil Procedure granting plaintiff leave to file the Proposed Third Amended Complaint in this action. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: New York, New York
March 17, 2021

Respectfully submitted,

/s/ David Jeffries

David Jeffries

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Attorney for Plaintiff